

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**DENISE L. WATSON
PLAINTIFF,**

v.

**TAKHAR COLLECTION
SERVICES, LTD.
DEFENDANT.**

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CASE #: 3:10-CV-527-REP

JURY TRIAL DEMANDED

**MOTION FOR DEFAULT JUDGMENT AS TO TAKHAR COLLECTION SERVICES,
LTD**

Comes now your plaintiff, by counsel, moves this Court for Entry of Default in the above referenced matter, and says as follows:

1. That this matter was filed in this court on July 28, 2010.
2. Service was effected through the Secretary of the Commonwealth of Virginia (docket #s 4- certificate of compliance by Secretary of the Commonwealth).
3. Defendant received notice on September 30, 2010 by Certified Mail, Return Receipt Requested. Exhibit A- return receipt (Docket #5-2). Exhibit B- USPS receipt information (Docket #5-3).
4. Defendant's operations manager sent a letter to counsel dated October 4, 2010. Exhibit C.
5. The time for a responsive pleading expired on October 21, 2010.
6. Plaintiff moved for default on October 25, which was entered by the clerk on October 28, 2010.

7. No answer, motion or other pleading has been filed with this court as of December 13, 2010.
8. The defendant is not an infant, incompetent or in the military.
9. The defendant is therefore in default.
10. The plaintiff whereupon moves this honorable court for an order entering default judgment for Statutory Damages of \$1,000.00, Attorney Fees and costs.
11. An Affidavit in Support is attached. Exhibit D.

DENISE WATSON

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Counsel for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of December, 2010, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

NONE

And I hereby certify that I will mail the document by U.S. mail to the following non-filing user:

Takhar Collection Services, LTD
Hardial Takhar, President
537-1623 Military Rd.
Niagara, NY 14304-1745

Takhar Group of Companies
Blair Wettlaufer, Manager
202 Beverly St.
Cambridge, Ontario, N1R 3Z8

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